



THE CONFEDERATED SALISH AND KOOTENAI TRIBES
OF THE FLATHEAD NATION

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A People of Vision

A Confederation of the Salish,
Pend d' Oreille
and Kootenai Tribes

TRIBAL COUNCIL MEMBERS:

Shelly R. Fyant -Chairwoman
Anita L. Matt -Vice Chair
Ellie Bundy McLeod - Secretary
Martin Charlo -Treasurer
Len Two Teeth
D. Fred Matt
Carole Lankford
James "Bing" Matt
Charmel R. Gillin
Mike Dolson

1. Applicant Identification: Confederated Salish and Kootenai Tribe (CSKT)
PO Box 278
Pablo, Montana 59864
2. Funding Requested
 - a. Assessment Grant Type: Community Wide
 - b. Federal Funds Requested
 - i. \$300,000
 - ii. Not Applicable (Site-specific Assessment Grant Waiver Not Requested)
3. Location: All land within the exterior boundaries of the Flathead Indian Reservation.
4. Property Information for Site-Specific Applications: Not Applicable
5. Contacts
 - a. Project Director
Rich Janssen, Director - Natural Resources Department
CSKT, 301 West Main, Polson, Montana 59860
Phone: (406) 883-2888
Email: rich.janssen@cskt.org
 - b. Chief Executive
Shelly R. Fyant, Tribal Council Chairwoman
PO Box 278, Pablo, Montana 59864
Phone: (406) 675-2700
Email: csktcouncil@cskt.org
6. Population

According to 2018 American Community Survey estimates, 29,717 persons live on the Flathead Indian Reservation, 34.3% of the residents (10,193 persons) are American Indians and 19,524 are not. Of the American Indians on the Reservation, 5,323 have enrolled as CSKT tribal members. Our non-tribal-member population is 24,394. Priority Sites are in the towns of Polson (4,843 persons, the largest town on the Reservation), Pablo (2,655, second-largest town), Hot Springs (544), Ravalli (76), and a rural millsite near the confluence of the Flathead and Jocko Rivers.

7. Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	4 (no town on the Reservation has population over 5,000)
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	1-10 (we are a recognized Indian tribe)
The priority brownfield site(s) is impacted by mine-scarred land.	Not Applicable
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	2, 3, 4
The priority site(s) is in a federally designated flood plain.	2, 3
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	Not applicable
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	Not applicable

8. Letter from the State or Tribal Environmental Authority

As the applicant, we the Confederated Salish and Kootenai Tribes, are the Tribal Environmental Authority. We plan to conduct assessment activities and are applying for FY21 federal brownfields assessment grant funds. Acknowledgement letter is attached from the Montana Department of Environmental Quality (DEQ). We will collaborate with DEQ, obtaining input about potential cleanup levels, recommended actions at Fee Land sites, and identifying State-level brownfields resources.



October 20, 2020

MaryRose Morigeau
Solid / Hazardous Waste &
Brownfields Tribal Response Program Manager
Confederated Salish and Kootenai Tribes
301 Main St.
Polson, MT 59860 City of Missoula

RE: Letter of Acknowledgment: Confederated Salish and Kootenai Tribes' Brownfields Grant Applications Hazardous Substance Assessment and Petroleum Product Assessment

Dear Ms. Morigeau:

I am writing to express Montana Department of Environmental Quality's (DEQ's) acknowledgment of the Confederated Salish and Kootenai Tribes' efforts to obtain a U.S. Environmental Protection Agency Brownfields Hazardous Substance Assessment Grant and a Brownfields Petroleum Product Assessment Grant to address contamination throughout the Confederated Salish and Kootenai Tribes' Reservation.

The DEQ supports Brownfields efforts in Montana, and wishes to promote assessment and cleanup activities that allow contaminated properties to be put into productive and beneficial use.

If you have any questions or comments about petroleum brownfield sites, please feel free to call Brandon Kingsbury at 406-444-6547 or email him at bkingsbury@mt.gov. If you have any questions or comments about hazardous substance brownfields sites, please contact Jason Seyler at (406) 444-6447 or jseyler@mt.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jenny Chambers", is written over a light blue horizontal line.

Jenny Chambers, Administrator
DEQ Waste Management & Remediation Division

cc: Jason Seyler; Brownfields Coordinator; Cleanup, Protection, and Redevelopment Section; jseyler@mt.gov
Brandon Kingsbury; Petroleum Brownfields Coordinator; Petroleum Technical Section; bkingsbury@mt.gov

Steve Bullock, Governor | Shaun McGrath, Director | P.O. Box 200901 | Helena, MT 59620-0901 | (406) 444-2544 | www.deq.mt.gov

Narrative/Ranking Criteria

Confederated Salish and Kootenai Tribes Grant Application

1. Project area Description and Plans for Revitalization

1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Area: The Confederated Salish & Kootenai Tribes (CSKT) once spanned territory covering more than 20 million acres through the mountains of Western Montana, North Idaho, and Southern Canada. Our peoples hosted Lewis & Clark in 1805, fed them and gave them traveling advice on their route westward. By 1855, pressure from non-Indian settlers led us to sign the Treaty of Hellgate, after which some of our members left their homelands. In 1891, the last 300 members of the Salish tribe still in the Bitterroot Valley were escorted by soldiers in a forced, tearful march northward onto what is now the Flathead Indian Reservation. Although only 1/20th of our original range, the Reservation is beautiful, with the largest natural freshwater lake in the West, glacier-capped peaks, and wide valleys containing sites sacred and important for our living legacy. In this setting, we struggle with poverty and brownfields blight, while successfully fighting to move forward with tribal self-determination and environmental protection.

In our history on the Reservation, we have taken many key steps toward self-determination. After the 1934 Indian Reorganization Act permitted tribes to establish their own governments, we were the first to do so. Almost immediately, we began the effort to protect the sanctity of our land, including a Tribal Council vote in 1936 to preserve 100,000 acres of the Mission Mountains. Much of this same area eventually became the first-of-its-kind Tribal Wilderness in 1982. In 2014, we completed a multi-year consultation, negotiation, and design process to make Highway 93 through the Reservation the most wildlife protective highway expansion in the U.S. In 2015, we became the first tribe to own and operate a major hydroelectric dam, gaining control of flows in the lower Flathead River, while gaining significant potential to increase our economic strength as a tribal nation.

We operate casinos, a tribal college, and have many associated for-profit initiatives, but prosperity has not been widespread, particularly near brownfields. Highway 93 is a prime tourist route from the interstate toward Flathead Lake and Glacier National Park, but high concentrations of blighted property at the entrances of small towns can cause tourists to pass by, or avoid a second visit. In Ravalli, Montana, a row of former small fueling stations stand mostly abandoned, there is no fuel available in town, and the poverty rate is 60.5%. In Hot Springs, Montana, visitors must pass through the main “T” intersection to get to one of the two local geothermal resorts, and at this entrance they see a former fueling station and an abandoned auto repair site. The poverty rate in this town with under-developed resort potential is 41.2%. In Pablo, Montana, the northern edge of town is dominated by a mile-long former lumber mill, and the poverty rate is 56.3%. These towns where brownfields are concentrated are some of the most economically challenged on the Reservation.

As described above, our tribal nation has the capacity to set national conservation precedents and succeed in ambitious initiatives, but some of our towns have been left behind. From the mid-1980’s through the early 2000’s, our local wood products industry collapsed leaving behind abandoned mills, fueling stations closed unable to comply with federal initiatives from 1989-forward, and too often small towns with former mills or fueling stations are also where we see the highest poverty rates. We seek a \$300,000 Assessment grant to address priority sites in these communities and reconnect them to the larger economy. We will do this building from our 17-year history of managing EPA Brownfields funds.

1.a.ii. Description of the Priority Brownfield Sites: This grant project will focus on assessment and reuse planning of the largest abandoned sawmills on the Reservation, and on dilapidated corridors of former fueling and auto repair businesses in the tourist-route towns of Hot Springs and Ravalli. The large mills are the Polson Mill, Pablo Mill, and the former Flathead Post & Pole site. Priority sites on tourist routes are Spring Creek properties in Hot Springs and the former Ravalli Cash Store. Discussion is below of why each site is important, past and current land uses, current conditions, and potentially environmental issues.

The Polson Mill is a 22.5-acre strip of empty land adjacent to an elementary school and surrounded on three sides by residential neighborhoods. This is the largest strip of open land within the core of the Reservation's largest town, and is a priority because it represents the most-significant opportunity for rapid redevelopment. The sawmill operated from the early 1960's to the mid 1990's. Since the mill buildings were removed, the site has been vacant. There are no structures on-site, and it is informal open space, with footpaths used by the school children through weedy fields. Typical mill contaminants in Montana include dioxins, fuels, and wood treatment chemicals in surface soil. We are concerned that the children might be exposed to contaminants in the current situation. Assessment and cleanup of this property provides an opportunity to turn an unused and likely contaminated gap in our community into a safe park with connecting residential neighborhood.

The Pablo Mill, which closed in 2009, is 118-acres. This site is a priority because of its large size, remaining infrastructure, and close proximity to subsidized tribal housing. There are 11 structures on-site, ranging from offices and sheds to the 42,500 square foot former main mill building. A northern business park is the targeted reuse, due to the remaining infrastructure (high-capacity electric, water, and natural gas service), and proximity to other businesses including S&K Electronics. Potential contaminants include PCBs (which are likely present in transformers), fuels, solvents, and oils from past vehicle maintenance operations, and pesticides in the former greenhouse area.

The former Flathead Post & Pole site is a 100-acre former sawmill and wood treatment facility at the confluence of the Flathead River and Jocko River. All buildings have been removed. The site is still used for fishing, but anglers must walk over abandoned building foundations, fire suppression piping, and unstable wood waste. Prior to being a sawmill, this property was traditional fishing grounds and had burial plots. We received an EPA Cleanup grant to remove pentachlorophenol from surface soil and institute a groundwater restriction zone. We have opened discussions with the nearby National Bison Range about reclaiming the property as an improved fishing access. Reuse Planning for the site would be a catalyst for removing blight, and enhancing (rather than detracting from) tourist opportunities near the Bison Range.

The Spring Street corridor in Hot Springs has a former fueling station and a vacant former vehicle maintenance shop at the main entrance to town. Locals are accustomed to seeing a petroleum sheen on Spring Creek which runs through town just north of the sites. Utility work on Spring Street identified significant areas of petroleum contamination, and the main corner has a blighted building. We seek to finish assessment of this area so it can be remediated and turned from an unfortunate blighted gateway to an inviting entrance with wayfinding signs to the nearby geothermal resorts.

Finally, the Ravalli Cash Store is a former gas station with glass front and attached fuel canopy currently over dilapidated vehicles. The owner inherited it and has approach CSKT about performing tank removal and assessment, but we have not had the resources. If petroleum impacts were found, the site would likely be eligible for state-backed cleanup. Currently it drags down the small community, lending a sense of dilapidation, and discouraging tourism. Reused, it would help the prospects for survival of nearby tourist-oriented food businesses (Bison Café and Windmill Village Bakery).

1.b. Revitalization of the Target Area

1.b.i Reuse Strategy and Alignment with Revitalization Plans: Our strategy for brownfields redevelopment is to reuse our largest mill sites, and to reduce blight in low-income communities with excellent tourism potential. Large mill sites in close proximity to existing housing and infrastructure are the Polson and Pablo Mills, which are near the center of each of the two largest towns on the Reservation. Blighted sites in low-income tourist routes include our two priority sites on the Spring Street Corridor at the entrance to Hot Springs and the Ravalli Cash Store abandoned gas station along the high-tourist-traffic Highway 93. Flathead Post & Pole has elements of both categories, as a large (100-acre) former mill located at an excellent fishing access near the National Bison Range.

Revitalization of the Pablo Mill into a business park is one objective of the current CSKT Sustainable Comprehensive Economic Development Strategy (CEDS), which directs our government to "Explore the feasibility of developing a business park...adjacent to existing tribal corporations and commercial/industrial development" of Pablo. Proposed reuse of the Polson Mill site is for housing and a

park. It is located in the center of town adjacent to the elementary school, existing housing, and water/sewer infrastructure, and fills the need to “Encourage the development of additional housing units for low-income, rental and elderly populations.” Brownfields collaboration with the landowner, Montana Rail Link, recently led to creation of a community park in Missoula, Montana (1/2-hour south of the Reservation), and we seek to build upon that model to reuse this site.

The town of Hot Springs identifies brownfields redevelopment needs in their Growth Policy, which has the first priority of ensuring “Any remaining issues from leaking underground tanks in town are resolved.” Visitors to the community must pass by the blighted intersection, and addressing it through assessment, cleanup planning, and redevelopment into a wayfinding site will benefit the existing geothermal resorts with more repeat visitors, and will facilitate redevelopment of the nearby Camas Hot Springs historical bath house.

Similarly, the Ravalli Cash Store site is key to removing blight and increasing tourist visits to an entire corridor. The site is between a watercraft inspection station and the Bison Café, and when assessed and redeveloped, will help draw visitors toward the café rather than encouraging them to leave the blighted community without spending time and money.

At the Flathead Post & Pole site, we are collaborating with the National Bison Range to enhance tourism opportunities and encourage longer visits involving more than just wildlife tours of the Range. Reuse of the site will accomplish our CEDS goal to “Promote Culturally Appropriate Tourism on the Reservation”, by providing a reclaimed natural setting to see interpretive information about tribal connection to our rivers, and allowing visitors to directly experience rejuvenating beauty of the river confluence and surrounding hills.

1.b.ii. Outcomes and Benefits of Reuse Strategy: Outcomes include large-scale reuse of land in our largest towns, improved appearance and wayfinding in key tourist corridors, and reclamation of a cherished river confluence that is now the site of nearly 40,000 cubic yards of discarded wood waste located partially in the flood plain. The Polson Mill is over 2% of the land area of the town, and when filled in will provide the largest park in the community, while connecting the eastern edge of the residential area to the currently-isolated south side of town. Reuse of the Pablo Mill will reduce trespass dangers (site is close to housing), while providing space for high-electric-capacity business development in the former mill buildings, and affordable housing on the southern end.

Redevelopment of the Spring Street Corridor brownfield sites will attract developer investment to the community, which is in an Opportunity Zone. The CSKT is completing alternative analysis for reuse of the Camas Hot Springs historical resort, and removal of blight will improve the chances for reuse of the 6,000 square feet historical building, while increasing repeat visits to the existing Symes Hot Springs Hotel and Alameda’s Hot Springs, each only two blocks from the Spring Street brownfield sites. Reuse of the Ravalli Cash Store will improve business for the Bison Café and Windmill Village Bakery, two local tourist-oriented eating establishments that rely on seasonal visitors stopping on their Highway 93 travels toward Glacier Park, rather than speeding past when they see abandoned buildings.

Desired outcome for the Flathead Post & Pole site is recreational reuse, after removing blight such as abandoned fire suppression piping, building foundations, and wood waste. Ultimate benefit is reconnection with a culturally important river confluence, removing industrial waste and blight to uncover opportunities for safe connection to the water and to the fishing opportunities our ancestors had at this site before industrial use.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: We have a long history of leveraging resources for brownfields assessment, cleanup, and redevelopment. In conjunction with a previous EPA Assessment grant, we secured a \$72,000 Montana Department of Natural Resources & Conservation (DNRC) Planning Grant for the Revais Creek Mine Tailings site. We were then awarded \$302,000 of Montana DNRC Implementation Grant funding for cleanup of the site. We also obtained \$128,000 in Montana DNRC Implementation Grant funding toward brownfields cleanup on the Joseph Allotment property. We have

leveraged in-kind utility services, gravel, and hauling from the Salish Kootenai Housing Authority (SKHA, which is external to CSKT) during cleanup of the Elmo Cash Store and Joseph Allotment properties. We have also helped site owners obtain resources from the Montana Petroleum Tank Release Compensation Fund (Petrofund) to install boreholes and groundwater monitoring wells, and evaluate drain routes as initial assessment of the Spring Street fueling station. We will continue to leverage assessment funding as a way to pull in State-level resources for supplemental assessment as well as cleanup.

In addition to stimulating availability of State-level environmental grants, an EPA Assessment grant would facilitate our pursuit of grants from the U.S. Department of Commerce Economic Development Administration, US Department of Agriculture, and the [Montana] Big Sky Economic Development Trust Fund, whose funds can be used for planning and job creation projects. Perhaps more importantly in the long term, completion of environmental due diligence and cleanup planning with an EPA Assessment grant would stimulate private investment in our tax incentive zones. The two Hot Springs priority sites are located in an Opportunity Zone where real estate development can lead to large federal tax benefits, and the Polson Mill is in the city of Polson Urban Renewal Area where tax increment financing can be used for a variety of infrastructure needs.

1.c.ii. Use of Existing Infrastructure: Reuse of each site will take advantage of the proximity to existing utilities. Our priority sites in Hot Springs, Polson, and Pablo are currently served by water, sewer, electrical, and communications lines. The Pablo Mill is also on an active rail line and has 11 buildings including the over-45,000-square foot main building available for sustainable reuse. The Ravalli Cash Store building is on a frontage road with full visibility and many access points from tourist-heavy Highway 93, and this transportation infrastructure is key to the reuse potential of the site. The main site building will be preserved, but the fueling canopy will be taken down during tank removal.

In Hot Springs, the infrastructure need is improved transportation and way finding in the entire community, so that the irreplaceable resource of natural geothermal springs at two existing resorts and one former resort can be found by visitors and utilized in an economically-viable way. The small town of Hot Springs is subject to high poverty rates and suffers economic downturns worse than areas with wider economic base. Improvement of the community gateway is key to viability of all the geothermal infrastructure and the operational hotels.

Natural infrastructure at the Jocko and Flathead River confluence will be reused for recreation as a result of this grant. This key location (Flathead Post & Pole site) is unique, and lies hidden behind brownfield blight. We will reclaim it. For infrastructure upgrades as-needed to support redevelopment, we will coordinate with Mission Valley Power, which is a federally owned electrical utility, operated and maintained by the CSKT on the Reservation.

2. Community Need and Community Engagement

2.a. Community Need

2.a.i. The Community's Need for Funding: Our community has very low population, low income and high poverty rates, and our government does not levy taxes. We instead rely on initiatives such as timber sales and tribally owned companies to obtain revenue, however our region is transitioning away from a timber-based economy (as evidenced by the closed mills) and we need EPA Assessment funds to turn blighted sites in the right direction.

Despite having larger land area than some states, our Reservation's population is only 29,717, and only three of our towns (Polson, Pablo, and Ronan) have populations over 1,000. Our small communities struggle to fill basic needs for housing, medical care, policing, and water/sewer infrastructure. Demands for public funds are especially high because of our low incomes and elevated poverty rates. Pablo has a median household income of only \$19,069, which is barely over one third of the statewide value (\$52,559). Reservation-wide median household income (\$42,154) is also lower than the State and the Nation. The poverty rates in the communities of our priority sites are high, including Pablo (56.3% poverty), Hot Springs (41.2%), Polson (16.6% our lowest rate), and Ravalli (60.5%). These rates, and the Reservation-

wide poverty rate of 22.5%, are well above the statewide poverty rate of 13.7%. EPA funding is an essential means for us to address concerns associated with brownfields sites.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: Our most significant sensitive population is Native American, low-income youth. The Reservation population is 32.7% Native American (U.S. is only 1.7%, and Montana overall is 8.2%). Our poverty rate sits at 22.5%, much higher than Montana (13.7%) and the U.S. (14.1%). Approximately a quarter (25.1%) of our population is under the age of 18. According to the CDC, the suicide rate for Native Americans in Montana is approximately 29 per 100,000 Montana residents while the US average is 13 per 100,000 residents. In 2018, the Flathead Indian Reservation was recognized as having a suicide cluster in Native American Youth. As described in *Suicide Clusters in Montana Native American Youth*, suicide risk factors for our children are concentrated by isolation, discrimination, and historical trauma; all of which are present on the Flathead Indian Reservation. Vacant and blighted brownfields can exacerbate feelings of isolation and hopelessness. In addition, the National Congress of American Indians research non-profit has found that on Reservations, housing shortage numbers continue to climb and of the housing that is available, 40% is considered substandard compared to 6% outside of the Reservations. Blighted and dilapidated properties are not benefitting our communities in any way. A 2018 Community Health Assessment, performed by the Lake County Health Department, asked community members what are the most important factors for a healthy community. Respondents identified the top three as having a good job and a healthy community, affordable housing, and access to healthcare and other services. Assessment and redevelopment of our brownfield's sites will eliminate blight (Spring Creek Corridor), help create jobs (business park in Pablo), and provide affordable housing (east end of the Polson Mill). All of these things will help reduce the feelings of hopelessness on the Reservation.

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions: American Indian people in Montana have considerably higher rates of illness and mortality than other Montana residents. An American Indian living in Montana, dies, on average, 18 years younger than his white counterpart. Brownfields and their associated contaminants pose a threat to the health of our residents. EPA considers polychlorinated biphenyls (PCBs) a probable human carcinogen and is a contaminant of potential concern at the Pablo Mill site. Cancer incidence among Native Americans on the Reservation, at 602 per 100,000, is higher than among white people living on the Flathead Indian Reservation (463 per 100,000). As described by the Montana Cancer Control Program in a 2019 study, the lung cancer death rate among Montana American Indians is the highest of any race, with a rate of 91 per 100,000 compared to 45 per 100,000 for white residents of Montana. Abandoned buildings such as the auto repair garage in Hot Springs, and additional brownfields sites on the Reservation may contain asbestos, a known cause of asbestosis, mesothelioma, and lung cancer. By assessing and cleaning up brownfields sites, we can take an active role in reducing disease and adverse health conditions.

(3) Disproportionately Impacted Populations: Residents of the Flathead Indian Reservation are particularly susceptible to environmental injustices. Our poorest residents live next to some of our largest brownfields sites, such as the Polson and Pablo mills. Pablo's poverty rate is 56.3% and Native American's make up 70.2% of the population. According to EPA's Environmental Justice Screening and Mapping Tool (EJSCREEN), Pablo is in the 85th percentile in the United States and in the 99th percentile in Montana for the cancer risk from airborne toxins. In addition, Hot Springs is in the 91st percentile in Montana for that type of risk, and 90th percentile for ozone. A recent study of environmental racism by EPA's National Center for Environmental Assessment found that people in poverty had approximately 1.3 times more exposure to air particulates than people living above the poverty line. Cleaning up our brownfields sites will have a positive effect on the health and welfare of residents. Assessing and redeveloping the Pablo Mill into a business park would reduce exposures to cancer causing contaminants while creating jobs to help lift people from poverty.

2.b. Community Engagement

2.b.i. Project Involvement and Project Roles: Community partners are listed in the table below. Our Brownfields Program will work closely with CSKT Economic Development Department Director Velda Shelby when reaching out to these groups and when prioritizing assessment grant activities, so that redevelopment brings maximum economic benefit to our Reservation and our tribal members.

Partner Name	Point of Contact	Specific Project Role
Salish Kootenai College (SKC) Pablo, MT	Anthony Berthelote Anthony_berthelote@skc.edu 406.275.4048	Provide learning opportunities for students as assessments are completed in their community.
Ronan Emergency Services Ronan, MT	Dan Miller publicworks@ronan.net 406.529.2464	Identify blighted buildings and historical locations of potential improper chemical use or storage.
Lake County Community Development Corporation Ronan, MT	Jim Thalen Jim.Thaden@lakecountycdc.org 406.676.5901	Provide technical assistance and access to capital resources.
Ronan Chamber of Commerce Ronan, MT	Susan Lake jlake@ronan.net 406.261.4897	Assist in the flow of capital and credit for potential new businesses.
Kootenai Culture Committee Elmo, MT	Vernon Finley vernon.finley@cskt.com 406.849.5541	Advise on cultural issues that affect Tribal policy and project development. Provide translation services.
Séliš-Qlispé Culture Committee St. Ignatius, MT	Tony Incashola tonyi@cskt.org 406.745.4572	Assist site development to preserve, protect, and perpetuate the living culture and traditional way of life of our people.
Montana Department of Environmental Quality Helena, MT	Jason Seyler jseyler@mt.gov 406.444.6447	Assist in the progression of brownfield sites as the state regulatory agency for Fee Land sites. Provide expertise regarding cleanup goals.

2.b.iii. Incorporating Community Input: With a well-established Brownfields Program, we have a successful community involvement strategy, which we will use for this Assessment grant. Our brownfields coordinator has an active presence at Tribal Council meetings, Salish Kootenai College events, monthly Culture Committee meetings (both Séliš-Qlispé and Kootenai) and monthly District Tribal meetings in advance of proposed projects in a specific district. Our Brownfields Program website (csktnrd.org/ep/tribal-response-program) and social media are used to distribute information and advertise meetings. We engage with the Char-Koosta News, the official news publication of the Flathead Indian Reservation, to publish legal notices and public meeting announcements. We will prepare a fact sheet for each priority site and distribute fact sheets at site-specific meetings. When we receive input from community members, we at a minimum respond to each comment, and also modify our sampling approach to address community concerns, where appropriate. When the COVID threat subsides, we will perform outreach at the annual Standing Arrow Powwow in Elmo and the 4th of July Powwow (Espapqeyni Celebration) in Arlee. During the COVID pandemic, we will hold online meetings with a call-in option for those with limited or no internet. For meeting efficiency, we will have a meeting chair to lead the discussion, and a separate co-host to respond to the chat.

3. Task Descriptions, Cost Estimates, and Measuring Progress

3.a. Description of Tasks/Activities and Outputs

Task 1. Program Management – Implementation and Lead: The CSKT Brownfields Program Manager will be responsible for all financial and administrative management of the grant, oversight of the cooperative agreement, as well as coordination with project partners and the EPA. Additionally, they will submit quarterly reports and site-specific information into ACRES. The Brownfields Program Manager will also handle procurement of a Qualified Environmental Professional (QEP). *Anticipated Schedule:* Cooperative Agreement completed with EPA as soon as possible (estimated 4 months) following award;

grant management throughout the 3-year period; QEP procurement completed within 3 months of completion of Cooperative Agreement. *Outputs:* 1 finalized cooperative agreement, 1 RFP issued, 1 QEP contract completed, 12 quarterly reports, 10 site-specific entries in ACRES.

Task 2. Community Outreach – Implementation and Lead: The CSKT Brownfields Program Manager will be the task lead responsible for a Community Involvement Plan with advice and editing from the QEP, as well as for conducting stakeholder meetings for each priority site with supporting materials and technical in-person consultation provided by the QEP. *Anticipated Schedule:* To be initiated following procurement of a QEP; will be carried out throughout the 3-year grant period. *Outputs:* 1 Community Involvement Plan, 6 stakeholder meetings and 6 fact sheets (one for each priority site).

Task 3. Site Assessment – Implementation and Lead: Site selection and prioritization will be led by CSKT and the QEP with input from the partners identified in this proposal and the local communities. We will obtain site access agreements (for non-tribally-owned land) and site eligibility determinations for priority sites. Two of our priority sites (Spring Street fueling station and Flathead Post & Pole) have been deemed brownfields-eligible under previous grants, and we expect streamlined eligibility review for these sites under a future Assessment grant. Through our current Brownfields Program, we are familiar with the process of site prioritization and eligibility determination, and we have a QAPP, which will be updated with new best practices and to ensure all items are address on the most-recent EPA Region 8 Quality Assurance (QA) Document Review Crosswalk.

We will complete ASTM-compliant Phase I Environmental Site Assessments (ESAs) to identify Recognized Environmental Conditions (RECs). After discussion with each site owner or applicable tribal land manager about data needs for the identified RECs, we will prepare Sampling and Analysis Plans (SAPs) and conduct ASTM-compliant Phase II ESAs to evaluate the extent and severity of contamination for those sites with identified RECs. All onsite activities will be performed in accordance with applicable EPA rules and regulations, grant requirements, state regulations, and CSKT guidelines. Assumed scale of assessment for example priority sites is listed after the budget table on the following page. *Anticipated Schedule:* The QAPP will be updated within 3 months of hiring a QEP. Phase I ESAs on four priority sites (Pablo Mill, Polson Mill, Ravalli Cash Store, and Spring Creek auto shop) will be completed within the first 1.5 years of the grant period. Phase II ESAs will be completed until there are 3 months remaining in the grant period, allowing time for budget reconciliation, ACRES updates, and final reporting. *Outputs:* 10 site access agreements, 10 site eligibility forms, 4 ASTM-compliant Phase I ESA reports, 5 EPA-approved Sampling and Analysis Plans, 5 Health & Safety Plans, and 5 ASTM-compliant Phase II ESA reports. **Non-EPA Resources:** The CSKT Tribal Historic Preservation Office (THPO) will perform a review for culturally-sensitive features before any ground disturbance during Phase II assessment.

Task 4. Cleanup & Reuse Planning – Implementation and Lead: QEP will perform cleanup planning at the Pablo Mill, Polson Mill, and Spring Street fueling station. Cleanup plans will include evaluation of alternatives and costs. QEP will also lead a reuse planning process to identify a preferred recreational redevelopment layout and key transportation needs (both on-site and at the highway entrance) for the Flathead Post & Pole site. *Anticipated Schedule:* Initiated toward the end of Year 1 of the grant, and completed with Tribal Council review/comment by the end of Year 2 to allow associated applications for cleanup funding, where warranted. *Outputs:* 3 Cleanup Plans and 1 Site Reuse Plan. **Non-EPA Resources:** The Kootenai Culture Committee, as the applicable committee with traditional fishing heritage at the former Flathead Post & Pole, will be consulted and provide input regarding recreational reuse.

3.b. Cost Estimates

The tables on the following page detail the project budget for the grant. 73% of the funds will be used for Phase I and Phase II assessments. Proposed costs are moderate for Program Management and Community Outreach, because there is some efficiency gained on these tasks when our Program Manager runs both an Assessment grant and our 128(a) Tribal Response Program grant.

Budget Categories		Project Tasks (\$)				
		1: Program Management	2: Community Outreach	3: Site Assessment	3: Cleanup & Reuse Planning	Total
Direct Costs	Personnel	\$12,262	\$6,000	\$0	\$0	\$18,262
	Fringe Benefits	\$5,027	\$2,460	\$0	\$0	\$7,487
	Travel	\$2,000	\$1,733	\$0	\$0	\$3,733
	<i>No Equipment, Supplies, or Other Costs</i>					
	Contractual	\$0	\$6,020	\$219,000	\$41,000	\$266,020
Total Direct Costs		\$19,289	\$16,213	\$219,000	\$41,000	\$295,502
Indirect Costs		\$3,020	\$1,478	\$0	\$0	\$4,498
Total Budget		\$22,309	\$17,691	\$219,000	\$41,000	\$300,000

*Fringe Benefits are 41% of Personnel cost. Indirect Costs are 17.47% of Personnel and Fringe Benefits.

Task 1: Program Management costs (\$22,309) are calculated as follows: Personnel costs of approx. 490 hours of Brownfields Program Manager at \$25/hour = \$12,262. Fringe Benefits at 41% of Personnel (\$5,027). Travel is airfare, lodging, per diem to attend one Tribal Lands & Environment Forum (TLEF) and one National Brownfields Conference (\$2,000).

Task 2: Community Outreach (\$17,691) is calculated as Personnel of 240 hours at \$25/hour (\$6,000), 41% Fringe (\$2,460), Travel cost of fuel and per diem for 17 trips to communities throughout the Reservation (\$1,733), and Contractual cost for stakeholder meetings (\$550 per site) and fact sheets (\$450 per site) for each of our 6 priority sites, plus \$200 to provide advice and editing for a new Community Outreach Plan (\$6,020).

Task 3: Site Assessment (\$219,000) is for contractual work to produce 4 Phase I ESAs at average of \$4,000 each (\$16,000), 5 Phase II ESAs (including Sampling & Analysis Plans and Report of Findings) averaging \$40,600 each (\$203,000). Phase I ESAs will be performed on the four priority sites that have not been assessed (Pablo Mill, Polson Mill, Spring Street auto repair, and the Ravalli Cash Store). Pablo Mill, with recent industrial use and large buildings remaining, will have a larger-than-average Phase I cost. The other Phase Is will be slightly below this average. At the Pablo Mill, Phase II cost will be approximately \$65,000 for Incremental Sampling Methodology (ISM) characterization of surface soil on the entire property; boreholes in the greenhouse/pesticides area, main mill building, and rumored transformer burial area; installation of three groundwater wells to establish flow direction and gradient; and additional laboratory analysis to support calculation of Site-Specific Cleanup Levels for the leaching-to-groundwater pathway. The Polson Mill assessment will have significant Phase II assessment cost of approx. \$45,000 to perform soil and groundwater testing near former maintenance and fueling areas. Ravalli Cash Store is a smaller site with routine investigation of petroleum impacts proposed for a historical tank system. Spring Street fueling station and the Spring Creek auto shop have had initial assessment, but substantial data gaps remain about the extent of petroleum impacts toward the creek, and source/overlap of multiple petroleum plumes. These small petroleum sites will have lower than average Phase II assessment costs near \$31,000 each.

Task 4: Cleanup & Reuse Planning (\$41,000) is for contractual work to produce 3 Cleanup Plans at average of approx. \$8,167 each = \$24,500, and 1 Reuse Plan for \$16,500. Cleanup Planning will be performed at the Pablo Mill, Polson Mill, and Spring Street fueling station. Pablo Mill will have both a conceptual cleanup plan and bid specifications for the preferred alternative along with engineer's cost estimate; therefore, will have higher than average cost. Reuse Planning for Flathead Post & Pole will involve community charrette, conceptual renderings, and transportation analysis to determine access routes across the site, optimal restroom, boat launch, and interpretive sign locations, and appropriate turning lanes and entrance configuration to facilitate visits by those traveling the adjacent highway to the National Bison Range.

3c. Measuring Environmental Results

MaryRose Morigeau, the CSKT Brownfields Coordinator, will be responsible for tracking and gauging progress. We will develop a detailed Work Plan that will include tasks, anticipated outputs and outcomes, and a schedule. Completed project deliverables and outputs will be compared to our grant schedule and be reported in our quarterly reports. All outputs will be entered into ACRES. If any obstacles arise in completing a deliverable, we will discuss the situation with our EPA Project Manager and develop a plan to achieve the desired outcome. Anticipated outputs for this grant include: 4 Phase I reports, 5 SAPs with Phase II Report of Findings, 3 Cleanup Plans, 1 Site Reuse Plan, 6 Site Fact Sheets, and 6 stakeholder meetings. Anticipated outcomes for this grant include: 1 urban park (approx. 18 acres), 2 housing developments, reuse of the largest Pablo Mill building (42,500 square feet), increased tourism revenue in Ravalli and Hot Springs, with 4 jobs retained and 12 new jobs created. Other outcomes will include reductions in blight, negative environmental impacts, and human health risks. We are confident that the proposed tasks will be completed within the 3 year grant timeline.

4. PROGRAMING CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. & ii. Organizational Structure and Description of Key Staff: CSKT operates and administers a wide variety of programs and projects through contracts and grants that serve Reservation residents and protect natural resources. These programs include the operation of Two Eagle River High School, an electric utility, and seven Head Start Centers. In addition, we operate and manage a housing program and the Salish Kootenai College. We own and operate a hotel on Flathead Lake and an electronics plant, which holds contracts with the private sector as well as with the U.S. Department of Defense. CSKT also manages approximately 1.3 million acres of agricultural and timbered land. Perhaps most notably, in 2015 we became the only tribal entity in the United States to operate a major hydropower dam.

We have administered an EPA Brownfield Section 128(a) Tribal Response Program since 2003, and for the past 8 years have administered a series of 104(k) competitive grants awarded by the EPA Brownfields Program. We believe our experience and the qualified staff listed below will ensure that the proposed Assessment grant is successfully executed in a timely manner and that financial, administrative, and technical requirements of the grant will be completed. Mr. Rich Janssen has served as Director of the Natural Resources Department for the past 14 years and will oversee the EPA Brownfields grant. Before taking this position he was the Environmental Protection Division Manager for 10 years. Currently, he oversees more than 140 Natural Resources staff. Janssen has an undergraduate degree from the University of Montana and a Masters of Business Administration from Gonzaga University. He oversees the CSKT Brownfields Program and communicates and coordinates with other Tribal Departments as needed. He also helps to secure funding to complete projects. MaryRose Morigeau, CSKT Brownfield Coordinator, has served in this position for three years. Morigeau has a Bachelor's degree in Business Administration and Management from Salish Kootenai College. She has developed an excellent relationship with our EPA Project Manager and has the institutional knowledge of the inventoried sites and Brownfields Program to ensure project success. She has also prepared numerous requests for proposals, and has overseen the hiring of expert environmental contractors.

4.a.iii. Acquiring Additional Resources: CSKT plans to hire a Qualified Environmental Professional (QEP) to help fulfill the community involvement, assessment and planning aspects of the grant. The CSKT Natural Resources Department includes a procurement officer that will ensure that the process of hiring a QEP will be carried out in accordance with CSKT Tribal Employment Rights Ordinance (TERO) and EPA procurement requirements. MaryRose Morigeau will assist the procurement officer with preparation and dissemination of an RFP, review of proposals, and selection of a QEP. Using this process, we will be able to obtain the expertise needed to successfully complete the project.

4.b. Past Performance and Accomplishments

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant:

(1) *Accomplishments:* Our Brownfields Tribal Response Program (TRP) has received and successfully managed EPA Brownfields Program funds since 2003, and has three active Brownfields grants that each have a separate function on our Reservation: TRP 128(a) grant helps us build internal capacity and operate a solid waste management/enforcement program, an Assessment grant (#BF96832601) allows us to address due diligence and cleanup planning needs using contracted QEP services on the highest priority locations among our over-150 inventoried brownfields sites, and site-specific Cleanup grant for the Flathead Post & Pole facility remediates pentachlorophenol impacts near the Flathead and Jocko Rivers. By building internal capacity, contracting due diligence and cleanup planning services, and putting federal resources into site-specific cleanup, our Program has been able to perform 10 Phase I and 20 Phase II assessments, plus 4 cleanups in the last 10 years. We have been able to clear 10 sites for reuse (either no cleanup needed, or cleanup completed) and have remediated 256 acres of land including a dilapidated gas station and adjacent property in Elmo (main population center for members with heritage from the Kootenai tribe), remediation of an illegal floodplain dump site, delisting of a State Superfund Site, and cleanup of the pentachlorophenol-impacted Flathead Post & Pole facility [soil removal performed, completion report pending]. These accomplishments and outcomes are recorded in ACRES.

(2) *Compliance with Grant Requirements:* CSKT is currently in compliance with all EPA Brownfields grant agreements and is in good standing with EPA Region 8. CSKT has received TRP 128(a) grants continuously starting in 2003, has managed three Cleanup grants (received in 2007, 2011, and 2017), and two Community Wide Assessment grants (received in 2013 and 2016). The CSKT Brownfields Program has complied with all reporting requirements, including the filing of quarterly and technical reports and annual financial status forms. All funds have been expended appropriately to achieve the expected grant outputs and outcomes. All site-specific information for assessments and cleanups is in ACRES. All funds from closed 128(a), Assessment, and Cleanup grants were expended completely. Our open EPA Brownfields grants are 128(a), Assessment, and Site-Specific Cleanup. Details of each is provided below.

The open 128(a) grant started 10/1/2018 and ends 9/30/2021. As of October 1, 2020, balance was \$51,823. We plan to utilize that amount on salary for our Tribal Response Program Manager, solid waste cleanup and enforcement activities similar to what we have conducted since 2003, and directing a permitting process for State-funded cleanup of the Revais Creek Mine Tailings. We anticipate that we will request supplemental funding (which is typical for 128(a) programs) before the end of the grant period.

Open Assessment grant period started 10/1/2016 and will end 9/30/2021. Of the \$200,000 awarded amount, \$35,583 remained as of 9/30/2020. We have performed more Phase II assessments than projected in our Work Plan (9 performed, 7 proposed), and have the following additional activities to perform with remaining funds: 2 presentations to Tribal Council, 2 landowner meetings, 3 Phase I assessments, QAPP update, and cleanup bid specifications for the Revais Creek Mine Tailings. One of the additional Phase Is is in eligibility review now, real estate due diligence is very active in our area at this time (due to people relocating to work remotely during the COVID-19 pandemic), and we should have no problem completing the Assessment grant completely and exceeding Work Plan commitments by the time the grant expires.

Our Cleanup grant started 7/31/2017 and will end 9/30/2021. As of 10/1/2020, \$129,490 remained in the grant. We have sampled groundwater and performed soil removal in accordance with a Cleanup SAP approved by EPA in June 2020. The following activities have occurred in September 2020, but have not yet been charged to CSKT by contractors: excavation, hauling, and disposal at the Hazardous Waste facility (\$58,492 estimated cost), fieldwork and project management by the engineering oversight firm (\$17,915 estimated cost). After those charges, our balance will be approximately \$53,083 to complete the following activities in 11 months: additional excavation in two areas where confirmation samples exceeded our Action Level for pentachlorophenol, backfill and reseeded, deed restrictions against groundwater use, and completion report. These activities can easily be completed in the remaining 11 months, and are projected to be slightly lower than the remaining balance. After these activities, CSKT will evaluate whether preliminary reuse planning can be initiated (such as community charettes for recreational reuse) with the small balance and will close the grant on-time and under-budget.

Attachment A:
Threshold Criteria
CSKT Brownfields Assessment Grant

Threshold Criteria Documentation

1. Applicant Eligibility

The Confederated Salish & Kootenai Tribes (CSKT) are applying for this EPA Brownfields Assessment Grant as a federally recognized tribe.

2. Community Involvement

The CSKT understand the value of community and stakeholder involvement in the Brownfields assessment program, and has held multiple meetings with environmental and cultural groups, real estate professionals, and Chambers of Commerce in preparation for this proposal. CSKT will inform and involve the community and other stakeholders during the planning and implementation phases of this project using the means outlined below and discussed in more detail in Section 3 of the Narrative Proposal.

CSKT will take the following Community Outreach steps under this grant:

1. Prepare and distribute educational fact sheets for our Priority Sites;
2. Hold open public meetings in the communities where assessment is proposed, and where cleanup planning is initiated;
3. Meet with stakeholders such as landowners, developers, and local Tribal Council district representatives to discuss assessments, cleanup, and redevelopment potential of specific properties; and
4. Reach out in-person at a brownfields booth during the Annual Cultural Celebrations (Powwows) in the communities of Arlee and Elmo. During these celebrations, our personnel will distribute Brownfields Program publications, discuss the status of ongoing assessments, and record concerns as well as redevelopment ideas provided by the community.

3. Expenditure of Assessment Grant Funds

Of the \$200,000 of Community Wide Assessment Grant funds awarded to CSKT in 2016, \$35,583 remains as of 9/30/2020. This equates to 82% of the grant being expended with 11 months of grant period remaining. A new Assessment grant would provide continuity to our Brownfields Program when the current grant period closes.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

10/28/2020

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Confederated Salish and Kootenai Tribes

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS:

0714094600000

d. Address:

* Street1:

PO Box 278

Street2:

* City:

Pablo

County/Parish:

Lake

* State:

MT: Montana

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

59855-0278

e. Organizational Unit:

Department Name:

Natural Resources

Division Name:

Environmental Protection

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

* First Name:

Norrie

Middle Name:

* Last Name:

Dusty Bull-Irvine

Suffix:

Title:

Contract Specialist

Organizational Affiliation:

Confederated Salish Kootenai Tribes

* Telephone Number:

(406) 675-2700

Fax Number:

(406) 275-2898

* Email:

norrie.dustybull@cskt.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

I: Indian/Native American Tribal Government (Federally Recognized)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-20-06

* Title:

FY21 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Confederated Salish Kootenai Tribes Brownfields Assessment Projects

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

MT

* b. Program/Project

MT

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

10/01/2021

* b. End Date:

09/30/2024

18. Estimated Funding (\$):

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

Ms.

* First Name:

Shelly

Middle Name:

R.

* Last Name:

Fyant

Suffix:

* Title:

Tribal Council Chairwoman

* Telephone Number:

(406) 675-2700

Fax Number:

(406) 275-2898

* Email:

shelly.fyant@cstk.org

* Signature of Authorized Representative:

Charlene Petet

* Date Signed:

10/28/2020